

Dear FCC,

As for IP relay, I do not believe that the billing question is that immediate since the actual costs are not really known and whether the two end points are in the same or different states is only relevant for the intrastate versus interstate billing question. In either case, both the initial call volume and additional costs will be minimal. For purposes of development of the requisite technology, all TRS providers should be given a temporary exemption. Although these service providers may not be considered small businesses by traditional SBA standards, they are probably small divisions of large corporations. The RFA rules should apply.

I believe that section 225 provides for this as well as other emerging technologies in the realm of TRS as recently amended in Title IV of the ADA (1990).

Winston A. Ching